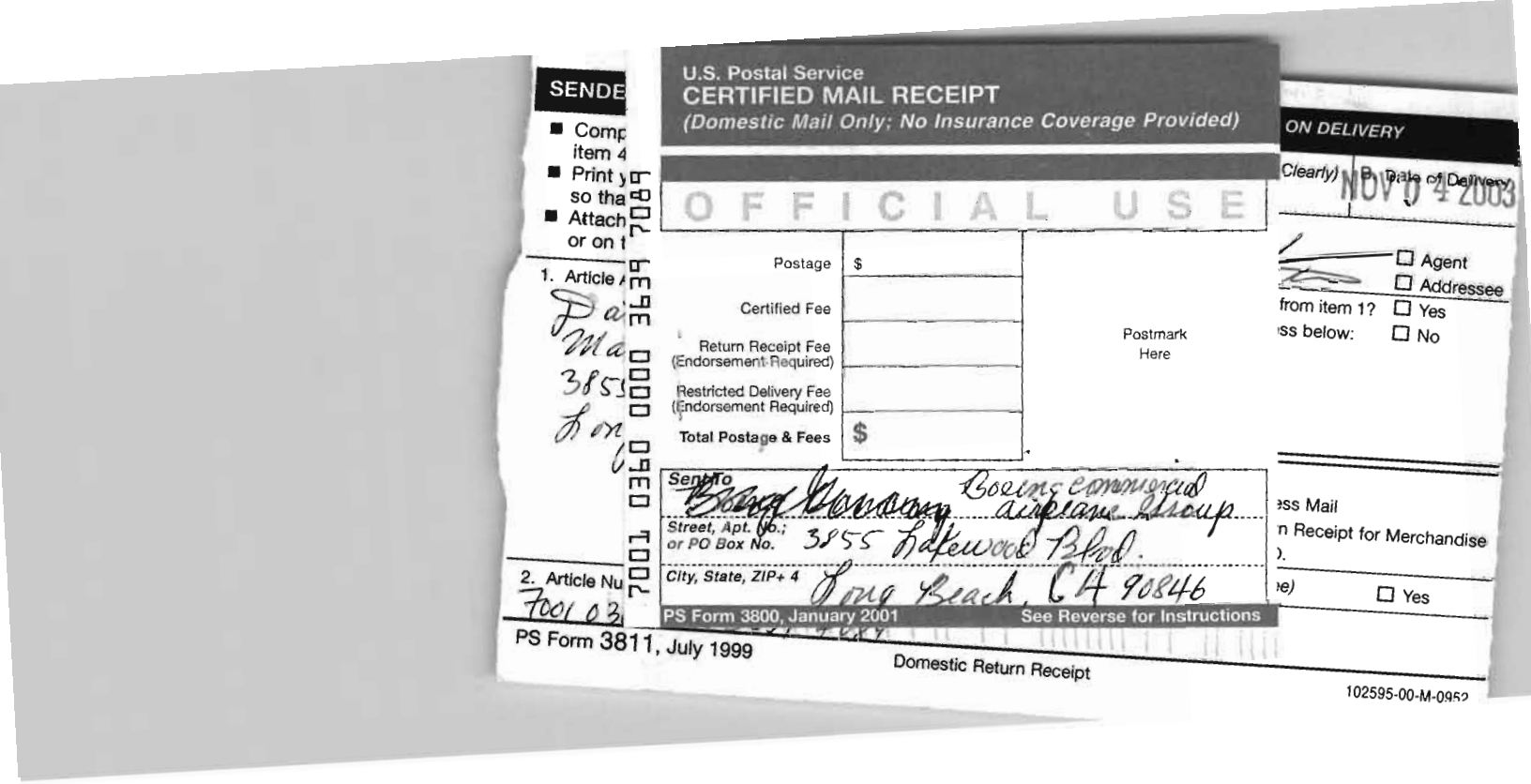

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REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

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In reply, refer to: WST-3

David Ganoung, Manager
Boeing Commercial Airplane Group
3855 Lakewood Boulevard
Long Beach, CA 90846

Dear Mr. Ganoung:

On August 20, 2003, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency (EPA) at Boeing Commercial Airplane Group, located in Long Beach, CA, EPA Identification Number CAD008378044. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended [42 U.S.C. 6927]. The August 20, 2003 compliance evaluation inspection found no violations of RCRA, at Boeing Commercial Airplane Group. A copy of the investigation report is enclosed for your information. This letter should not be construed as a determination by U.S. EPA of your compliance with any other applicable regulations.

EPA provides copies of investigation reports to state agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe that this report contains privileged or confidential information, you may make a claim within fourteen (14) calendar days from the date of receipt of this letter. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

If you have questions related to technical aspects of the investigation report or this letter, please contact Clint Seiter at (415) 972-3298.

Sincerely,

Frances Schultz

Frances Schultz, Manager
RCRA Enforcement Office

enc.
cc (w/o enc.): Steve Lavinger, DTSC
Cheryl Sandel, Long Beach Dept. of Health & Human Services

CERTIFIED MAIL NO.
RETURN RECEIPT REQUESTED

In reply, refer to: WST-3

David Ganoung, Manager
Boeing Commercial Airplane Group
3855 Lakewood Boulevard
Long Beach, CA 90846

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Sincerely,
Frances Schultz, Manager
RCRA Enforcement Office

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Cheryl Sandel, Long Beach Dept. of Health & Human Services

MAIL CODE	WST-3	WST-3	WST-3			
SURNAME	SEITER	McDonald	Schultz			
DATE	10-2-03	10/3/03	10/30/03			

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

WASTE MANAGEMENT DIVISION

RCRA ENFORCEMENT OFFICE

Purpose:	RCRA Compliance Evaluation Inspection
Facility:	Boeing Commercial Airplane Group 3855 Lakewood Boulevard Long Beach, CA 90846
EPA ID Number:	CAD008378044
Date of Inspection:	August 20, 2003
EPA Representatives:	Clint Seiter Environmental Protection Specialist (415) 972-3298 Cameron McDonald Environmental Protection Specialist (415) 972-3308
Long Beach Dept. of Health & Human Services:	Cheryl Sandel Hazardous Material Specialist (562) 570-4127
Facility Representative:	David Ganoung Manager (562) 593-4285
Report Prepared By:	Clint Seiter
Report Date:	October 2, 2003

BACKGROUND

Facility Description

The Long Beach Boeing site is a component of Boeing Commercial Airplanes, producing the 717 twinjet (a commercial, short-range jetliner) and supporting in-service airplanes. Opened by the Douglas Aircraft Company in 1941, the Long Beach site became part of Boeing as a result of the merger of Boeing and McDonnell Douglas in 1997. The facility was renamed the Long Beach Division of Boeing Commercial Airplanes in 1998. Currently, the facility assembles approximately one 717 twinjet per month. The airplane sections (fuselage, wings, tail and nose) are manufactured off-site and assembled on the facility premises, by means of a chain-driven assembly line. After assembly, the airplane is painted with a protected coating in another area of the facility. Boeing Long Beach currently employs approximately 2000 workers.

Per a review of the manifest database of the California Department of Toxic Substance Control (DTSC) and the facility's manifests, the facility is a large quantity generator of both RCRA and non-RCRA California only hazardous waste.

The facility's major RCRA wastestream is chromium based (D007), resulting from paint related waste, and discarded sealant tubes.

Per the EPA enforcement database, the facility was last inspected by EPA on August 21, 1990, where manifest related violations were noted. The facility returned to compliance on February 1, 1991.

INVESTIGATION

The purpose of the investigation was to determine Boeing's compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268 and 279, and the California Code of Regulations (CCR), Title 22, Division 4.5 and the California Health and Safety Code, Division 20. On August 20, 2003, Clint Seiter and Cameron McDonald, representing the U.S. Environmental Protection Agency (EPA), and accompanied by Cheryl Sandel, representing the Long Beach Department of Health & Human Services (Long Beach) conducted an unannounced site investigation at Boeing Commercial Airplane Group, Long Beach, CA (EPA ID# CAD008378044). Upon providing introductions and credentials, the inspectors contacted Mr. David Ganoung, the Facility Manager. The inspectors explained that this was a routine inspection to determine whether or not the facility was in compliance with federal and state regulations concerning the proper management of RCRA and non-RCRA hazardous wastes. The inspection would consist of a walkthrough of the facility, focusing on those areas where hazardous wastes were handled or stored, with photos taken, followed by a record review and a post-inspection outbriefing. In the course of the pre-walkthrough briefing, the inspectors provided facility representatives with a copy of the Small Business Regulatory Enforcement Fairness Act (SBREFA) Information Sheet.

Walk-Through Inspection

- Building 80

The assembly of the planes' components take place in this building. The fuselage of the plane moves down the length of the building by a chain-driven assembly line, where its component parts (including the wire harness) are attached and the lubricating fluids are added. There are numerous satellite accumulation areas throughout the building, identified by their location to the nearest building column (numbers: east-west, letters: north-south, e.g. 5B). Satellite accumulation area drums are color-coded to identify the type of waste that goes in them: yellow for aerosol cans, red for solvent-soaked rags, blue for paint cans/mixing cups/resins and adhesives, green for sealant tubes. Black drums signify either oil contaminated debris, spent batteries, or other miscellaneous waste (Attachment 1, Photo 1). Every satellite accumulation drum gets a unique identifying number that is tracked on a database maintained by the facility's administrative staff (Attachment 1, Photo 2). The drum code numbers identify the type of waste containerized, the location of the drum, the current year, and the specific drum. The inspectors selected two containers at random and had the facility representative look up their drum code numbers on the database. In both instances the database was able to accurately describe the drum and its contents. Satellite accumulation areas are inspected weekly.

There is a small vehicular maintenance center within the building, used to maintain fork lifts, portable carts, ground service equipment and other small motor operated devices (more extensive vehicular maintenance is outsourced off site). There was a satellite accumulation area in the maintenance center, in which were stored one drum of used oil, one drum of spent hydraulic oil, a container for oily rags and a container for oily debris. All containers were in good condition, closed, and labeled properly.

- Buildings 81 - 83

These buildings are reserved for training operations. No hazardous wastes are generated or stored here.

- Building 84

Airplane subassemblies are stored in this building. No hazardous wastes are generated or stored here.

- Building 85

Virgin product is stored in this building. No hazardous wastes are generated or stored here.

- Building 86

There is a small parts paint booth located in this building, along with a satellite accumulation area. The waste streams for the painting operations include paint mixing cups, paint sludge, spent filters, and rags contaminated with solvents. Each waste stream has its own color-coordinated waste container. At the time of the inspection, all containers were in good condition, closed, and labeled properly.

- 90-day hazardous waste storage yard #1

The hazardous waste storage yard is enclosed by a padlocked wire fence. Per the facility representative, it is company policy that no company personnel enter the storage yard alone, and all personnel carry two-way radios with them. At the time of the inspection there were 15 cubic-yard boxes, 15 55-gallon drums, and 4 5-gallon drums stored in the yard. All hazardous waste containers were in good condition, closed, properly labeled, and within the allowable time frame for large quantity generators of hazardous waste (90 days). No violations were noted.

- Building 87

Extensive painting operations are conducted within this building. At the time of the inspection there was one 3-cubic-yard, gasketed bin in which discarded paint cans and other paint-related debris were stored (Attachment 1, Photo 3). No violations were noted.

The facility's wastewater treatment center is also located in this building. At the time of the inspection there was no hazardous waste being stored in the wastewater treatment center's satellite accumulation area.

- The ramp

Newly assembled airplanes undergo various tests here (flaps, hydraulic systems, vertical stabilizers, radar, electrical systems, etc.). There are three positions on the ramp for testing, and each position has its own satellite accumulation area (Attachment 1, Photo 4). No hazardous waste violations were noted.

- 90-day hazardous waste storage yard #2

Hazardous waste generated from the ramp and from TCE-contaminated monitoring wells is stored in this fenced yard. The waste is stored in drums, and, in the case of the TCE-contaminated water, also in six 4500-gallon tanks (Attachment 1, Photos 5 and 6). All containers and tanks were in good condition, closed, and properly labeled. No violations were noted at the time of the inspection.

Record Review

- Contingency Plan: satisfactory
- Training records: satisfactory
- Manifests: satisfactory
- Biennial report: satisfactory
- Weekly inspection log: satisfactory
- Daily tank inspection log: satisfactory

SUMMARY

The inspectors noted that all aspects of the facility's hazardous waste management system observed during the inspection were effective in achieving compliance. No violations were noted.

ATTACHMENT 1

ATTACHMENT 1 - PHOTOS

Photo 1: Typical satellite accumulation area in Building 80

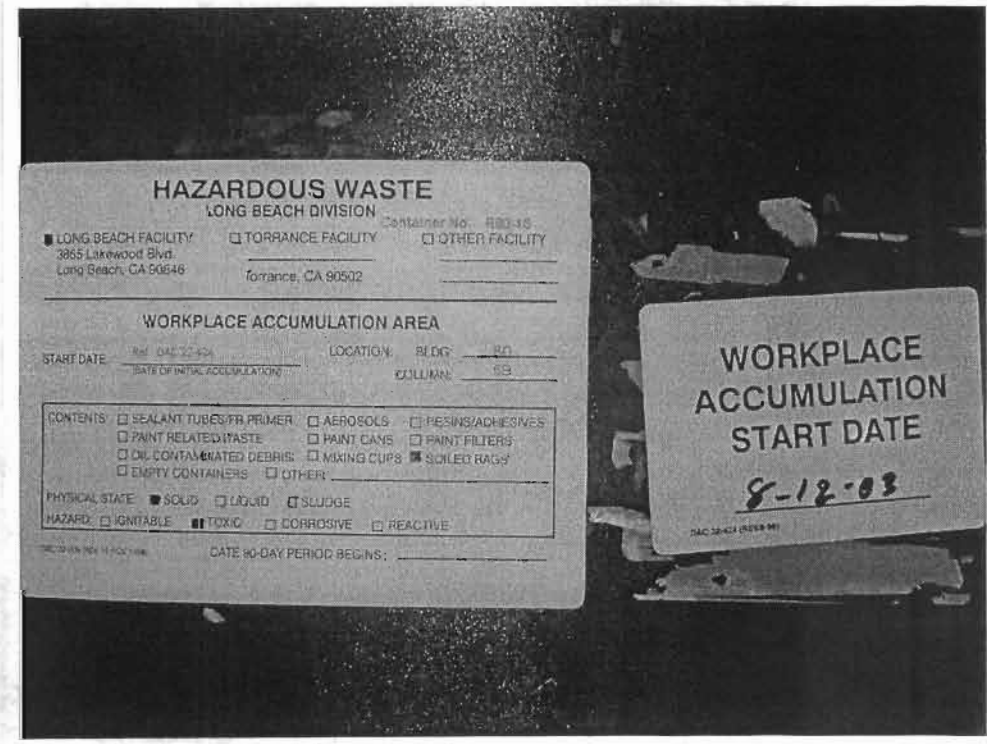

Photo 2: Close up of drum label

ATTACHMENT 1 - PHOTOS

Photo 3: Gasketed bin for paint waste in Building 87

Photo 4: Ramp satellite accumulation area

ATTACHMENT 1 - PHOTOS

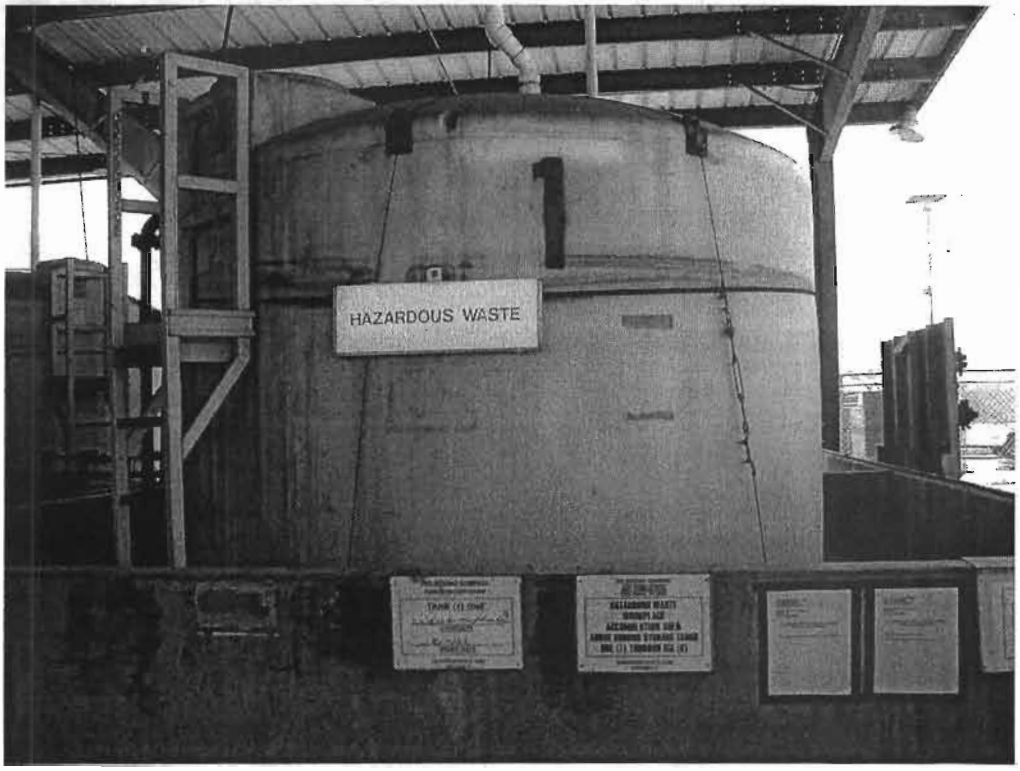

Photo 5: 4500 gallon tank for TCE-contaminated water

Photo 6: Wastewater tank label